

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

CIVIL ACTION NO:04-10568WGY

ANDREA REX,

Plaintiff,

v.

LSG SKY CHEFS, INC.

Defendant.

*May 19, 2004, as modified*  
YOUNG, D.J.  
So ordered as the case management  
scheduling order.

Discovery due Apr 29, 2005  
Dispositive Motions due Nov 19, 2004

*William G. Young*  
U.S. District Judge

REVISED JOINT STATEMENT FILED PURSUANT  
TO FEDERAL RULE OF CIVIL PROCEDURE 26(F) AND LOCAL RULE 16.1

The plaintiff, Andrea Rex (hereinafter "Rex"), and the defendant, LSG Sky Chefs, Inc., (hereinafter "LSG"), appearing by and through counsel, hereby submit the following Joint Statement pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16.1 of the Rules of this Court:

(1) Joint Discovery Plan:

All factual discovery shall be completed by November 30, 2004.

Plaintiff's Initial Expert Disclosures shall be filed on or before December 31, 2004.

Defendant's Initial Expert Disclosures shall be filed on or before January 31, 2004. Depositions of experts (if any) will be conducted on or before April 29, 2005.

(2) October 3, 2004 – ADR Screening *to be scheduled on or after.*

(3) May 5, 2005 - Trial *to be scheduled on or after.*

(4) Agenda of Matters to be Discussed at the Scheduling Conference

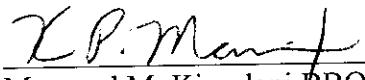
The parties submit the following agenda of matters to be discussed before this Court at the Initial Scheduling Conference:

- (a) Plaintiff intends on filing an expedited motion for application of Texas law and summary judgment on the breach of warranty claim contained in her amended complaint.
- (b) Defendant intends on filing a motion to sever and stay the 93A claim. The outcome of this motion will clearly impact the scheduling of this matter.

Attorney for the plaintiff,  
Andrea Rex

  
Keith Halpern  
4 Longfellow Place  
37<sup>th</sup> Floor  
Boston, MA 02114  
(617) 722-9952

Attorneys for the defendant,  
LSG Sky Chef's, Inc.

  
Maynard M. Kirpalani BBO# 273940  
Kevin P. Mannix, BB0# 640071  
WILSON, ELSE, MOSKOWITZ, EDELMAN &  
DICKER LLP  
155 Federal Street  
Boston, MA 02110  
(617) 422-5300

Date: 5/17/04